

FILED IN OPEN COURT

DATE 11/2/2022

BY C. Amos

DEPUTY CLERK

Lynchburg DIVISION, W.D. of VA

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

UNITED STATES OF AMERICA

v.

CHRISTY J. CASH BOWLING
Defendant

)
) Criminal No. 6:22CR21-001

)
) INFORMATION

)
) In Violation of:

) 18 U.S.C. § 641

) 18 U.S.C. § 152(1)

The United States Attorney Charges:

INTRODUCTION

1. On or about November 19, 2020, CHRISTY J. CASH, a resident of Pittsylvania County, filed a petition for Chapter 13 bankruptcy pursuant to Title 11, United States Code, with the United States Bankruptcy Court for the Western District of Virginia. Upon filing, the case was assigned file number 20-61514.

2. During the relevant period of November 19, 2020, and December 15, 2021, Cash had an ownership interest in a 2015 Dodge Ram Truck which she initially failed to disclose and subsequently falsely claimed to have transferred. Additionally, during the relevant period in the three years preceding her bankruptcy filing, Cash received undisclosed income from fraudulently obtained government benefits.

3. On December 18, 2020, Cash knowingly and fraudulently made false material statements under oath in relation to her pending bankruptcy case. In a proceeding before the Office of the United States Trustee, at a meeting of creditors conducted pursuant to Title 11, United States Code Section 341, Cash made false statements, including but not limited to the following:

- a. That she listed all of her assets on the bankruptcy documents;
- b. That there were no additions or corrections that needed to be made since the case was filed; and
- c. That the petition, schedules, and statement of financial affairs were true and correct.

4. On December 3, 2020, Cash knowingly and fraudulently made false declarations under penalty of perjury on Schedules and the Statement of Financial Affairs filed in relation to her pending bankruptcy case. For example:

- a. Cash initially failed to disclose her ownership in a 2015 Dodge Ram Truck.
- b. Cash failed to disclose thousands of dollars in income received prior to her bankruptcy filing on account of fraudulently obtained government benefits.

5. On December 15, 2021, the United States Bankruptcy Court for the Western District of Virginia dismissed Cash's case after she failed to respond or otherwise contest the Chapter 13's Trustee's motion seeking dismissal on the basis of Cash's failure to disclose her ownership interest in the 2015 Dodge Ram Truck.

COUNT ONE
(Concealment of Bankruptcy Assets)

The United States Attorney charges that:

1. The Information in the Introduction is realleged and incorporated by reference.
2. Between November 19, 2020 and December 15, 2021, in the Western District of Virginia, CHRISTY J. CASH knowingly and fraudulently concealed property belonging to the estate of the debtor from the United States Trustee, the Chapter 13 Trustee and from creditors in a pending bankruptcy case before the United States Bankruptcy Court for the Western District of Virginia (Case Number 20-61514).

3. CHRISTY J. CASH knowingly and fraudulently concealed her ownership interest in a 2015 Dodge Ram Truck and knowingly and fraudulently concealed thousands of dollars in fraudulently obtained income in the years prior to her bankruptcy filing.

4. All in violation of 18 U.S.C. §152(1).

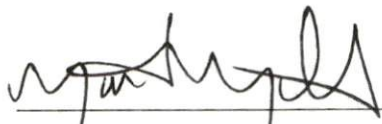
COUNT TWO

(Theft of Government Money)

1. Beginning in or about April 1, 2010, and continuing to in or about September 30, 2020, in the Western District of Virginia, the defendant, CHRISTY J. CASH, did willfully and knowingly steal and convert to her own use, money of the Social Security Administration ("SSA"), a department or agency of the United States, namely Title II Retirement Insurance benefit payments to which she knew she was not entitled, said benefits having a value in excess of \$1,000.

2. In violation of Title 18, United States Code, Section 641.

Date: 10/19/2022



CHRISTOPHER R. KAVANAUGH
UNITED STATES ATTORNEY